

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS**

MICHAEL ETCHEGOINBERRY, *et al.*,

Plaintiffs,

v.

THE UNITED STATES OF AMERICA,

Defendant.

No. 11-564 L

Senior Judge Marian Blank Horn

*Electronically filed on  
July 30, 2020*

**JOINT PROPOSED SCHEDULE**

Pursuant to this Court's July 20, 2020 Order (ECF 139), Plaintiffs and the United States of America (collectively the "Parties") hereby submit this proposed schedule. By Friday, August 28, 2020 Plaintiffs will file an amended complaint. By Friday, September 25, 2020, the United States of America will file its response. Should the United States of America file a motion to dismiss, the Parties will meet and confer to propose a joint briefing schedule.

Dated: July 30, 2020

Respectfully submitted,

BEVERIDGE & DIAMOND, P.C.

Jean E. William  
Deputy Assistant Attorney General  
Environment & Natural Resources Division

s/ Eric L. Klein

Eric L. Klein  
Gus B. Bauman  
1350 I Street, N.W., Suite 700  
Washington, DC 20005  
Tel: (202) 789-6000 / Fax: (202) 789-6190  
Email: eklein@bdlaw.com  
gbauman@bdlaw.com

s/ Frank J. Singer

FRANK J. SINGER  
WILLIAM J. SHAPIRO  
United States Department of Justice  
Environment & Natural Resources Division  
Natural Resources Section  
Post Office Box 7611  
Washington, D.C. 20044-7611  
Telephone: (202) 616-9409  
Fax: (202) 305-0506  
Email: frank.singer@usdoj.gov

KERSHAW, COOK & TALLEY PC

William A. Kershaw  
401 Watt Avenue  
Sacramento, CA 95864  
Tel: (916) 448-9800 / Fax: (916) 669-4499  
Email: bill@kctlaw.com

*Attorneys for the United States*

*Counsel for Plaintiffs*